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Formed in the State of PA
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ATTORNEY FOR MOVANT: BMW BANK OF NORTH AMERICA

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN DIVISION**

IN RE:

TAKIDIA T LIGON
a/k/a TAKIDIA T JENNINGS, Debtor

§ CASE NO. 18-32439-JNP
§
§ CHAPTER 13
§
§ Hearing date: December 10, 2019@10:00
§ A.M.
§
§ **NOTICE OF MOTION TO VACATE**
§ **AUTOMATIC STAY**

TO:

Brad J. Sadek
1315 Walnut Street, Ste 502
Philadelphia, PA 19107

Takidia T Ligon
2 S Syracuse Drive
Cherry Hill, NJ 08034

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Cherry Hill, NJ 08002

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One Newark Center Ste 2100
Newark, NJ 07102

PLEASE TAKE NOTICE that on **Tuesday, December 10, 2019 at 10:00 A.M.**, or as soon as the matter may be heard, the undersigned, attorneys for Secured Creditor **BMW Bank of North America** its assignees and/or successors in interest, will move before the Honorable Jerrold N. Poslusny Jr. of the United States Bankruptcy Court, 400 Cooper Street, Camden, NJ 08101 for the entry of an *Order Vacating the Automatic Stay* with respect to Debtor's 2011 BMW 3 Series Sedan 4D 328xi AWD, V.I.N. WBAPK5G59BNN27089, and allowing BMW Bank of North America to continue or institute a repossession action, by reason of the Debtor's failure to make regular monthly payments to BMW Bank of North America.

Respectfully Submitted,

Mester & Schwartz, P.C.
Attorney for Movant

Dated : November 18, 2019

/s/ Jason Brett Schwartz, Esquire
Jason Brett Schwartz, Esquire